

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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U.S. DISTRICT COURT
DIST. OF MASS.
16cr10271

UNITED STATES OF AMERICA

v.

DOUGLAS MERCIER,

Defendant.

) Criminal No. 16cr10271
)
) VIOLATION:
)
) 18 U.S.C. § 1956(h)
) (Conspiracy to Launder Monetary
) Instruments)
)
) 18 U.S.C. § 982(a)(1)
) (Criminal Forfeiture)
)

INFORMATION

COUNT ONE

18 U.S.C. § 1956(h) – Conspiracy to Launder Monetary
Instruments

The United States Attorney charges that:

From in or around June 2015 through in or around October 2015, in the District of
Massachusetts, the District of New Hampshire, and elsewhere,

DOUGLAS MERCIER,

defendant herein, did knowingly combine, conspire, and agree with others, persons known and
unknown to the United States Attorney, to commit offenses against the United States in
violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and
attempt to conduct a financial transaction affecting interstate and foreign commerce, which
involved the proceeds of a specified unlawful activity, that is marijuana distribution, with the
intent to promote the carrying on of specified unlawful activity, that is marijuana distribution,
and that while conducting and attempting to conduct such financial transaction knew that the

property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

MANNER AND MEANS

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following cash deposits by the defendant in the District of Massachusetts and the District of New Hampshire of marijuana distribution proceeds into Bank of America bank accounts:

Date	Amount
June 24, 2015	\$9,500
July 9, 2015	\$9,500
August 10, 2015	\$9,500
August 12, 2015	\$9,500
August 13, 2015	\$9,400
August 18, 2015	\$9,000
August 18, 2015	\$9,000
August 18, 2015	\$9,600
August 20, 2015	\$9,500
August 28, 2015	\$9,500
September 1, 2015	\$9,500
September 10, 2015	\$9,500
October 1, 2015	\$9,500
October 1, 2015	\$9,500
October 11, 2015	\$9,500

All in violation of Title 18, United States Code, Section 1956(h).

MONEY LAUNDERING FORFEITURE ALLEGATION
(18 U.S.C. § 982(a)(1))

The United States Attorney further charges that:

1. Upon conviction of the offense alleged in Count One of the Information,

DOUGLAS MERCIER,

defendant herein, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offenses, and any property traceable to such property.

2. If any of the property described in Paragraph 1 above, as a result of any act or omission of the defendant -

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to 18 U.S.C. §982(b), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1.

All pursuant to Title 18, United States Code, Section 982(a)(1).

Respectfully submitted,

CARMEN M. ORTIZ

United States Attorney

By:

A handwritten signature in black ink, appearing to read 'ER', is written over a horizontal line.

ERIC S. ROSEN

Assistant U.S. Attorney

Date: August 31, 2016